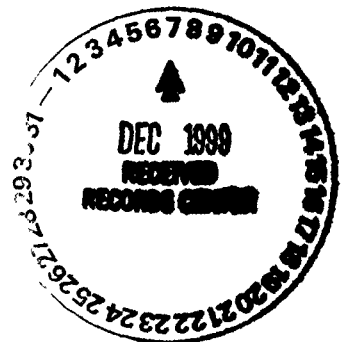


**Summary Report of**  
**Phase I RCRA Closure Activities for**  
**Tank and Ancillary Equipment System #12**  
**in Building 771**

**U.S. Department of Energy**  
**Rocky Flats Environmental Technology Site**  
**EPA ID No. CO7890010526**



**Reviewed and Approved by:**

T.C. Baker  
T.C. Baker, Environmental Compliance, RMRS

11/22/99  
Date

**Prepared by:**

NCT Van Tyne  
NCT Van Tyne, P.E., IT Corporation

11/22/99  
Date  
REVIEWED FOR CLASSIFICATION/UCNI  
By B. W. Hoffmann  
Date 12-2-99  
u/ Nu  
IA-B771-A-00047

**ADMIN RECCRD**

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## 1.0 PURPOSE

This Summary Report for Phase I activities in the RCRA closure of Tank and Ancillary Equipment System #18 is a requirement of Section 1.2 of the Closure Description Document (CDD) for this system (RF/RMRS-99-410 UN). The major features of this report include a declaration that the piping described in the document was removed as planned, a description of major closure activities and any deviations from those stated in the document, a copy of any newly-generated drawings and relevant analytical results, and a statement regarding whether the tanks included in this system have met the requirements of the "RCRA Stable" condition.

## 2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

The process piping for System #12 indicated in the CDD, Figures 1-3, was removed under IWCP work package number T0100830, the total amount removed was 460 feet of piping, consisting of 91 feet of Kynar™-lined steel pipe and 359 feet of stainless steel pipe. Thirteen valves were also removed. All removals were confirmed through pre-job and post-job walkdowns of the system.

A fill line for 8M potassium hydroxide solution is attached at the top of tanks D-715 and D-716. This line is currently blanked off, so that no liquid can be re-introduced into either tank. The 8M potassium hydroxide line will be removed during Phase I closure activities for System #29.

Piping removal was accomplished by using the pipe-crimping tool and the 4-wheel cutter. A combination of short pipe stubs and blind flanges was used at Termination Points (TPs) in the vicinity of tanks, and pipe stubs were used at the remaining locations. A small amount of dry absorbent was placed inside the outer bag at the pipe stub TPs.

The pipe sections were inspected visually by looking at them from one end after they were size reduced. Crimped pipe sections were removed prior to inspection. No blockages were found in any sections and the pipe interiors appeared to be dry. The sections were characterized as non-hazardous transuranic waste and were placed into one of two IP-2 metal waste crates, depending on their material of construction.

Analytical results revealed that the solutions from the tap and drain activity were basic, with pH >14, and therefore were assigned EPA waste code D002 (corrosivity). No additional liquids or sludges were recovered during piping removal activities.

A total of 11.5 liters of liquid were recovered among 6 bottles. This liquid is being held in bottles for processing through the Miscellaneous Cementation treatment process (Bottle Box). These bottles carry the EPA waste code listed above.

### **3.0 TANK STATUS WITH RESPECT TO THE "RCRA STABLE" CONDITION**

Tanks D-715, D-716, D-764 and D-765 are included in the Mixed Residue Tank Inventory. Tanks D-764 and D-765 now meet the requirements for the "RCRA Stable" condition as follows:

- 1 The tanks are operationally empty, i.e., they have been drained to the maximum extent possible using readily available means.
- 2 All process piping connected to the tanks has been removed, except for the common drain line linking tanks D-3 and D-4.
- 3 Inlets to and outlets from the tanks, except for the vacuum/vent lines, have been isolated and contained, or locked and tagged out.

Because the 8M potassium hydroxide fill line is connected to tanks D-715 and D-716, these two tanks will not meet the requirements for the "RCRA Stable" condition until the fill line is removed as part of System #29.

The "RCRA Stable" designation will be requested for tanks D-764 and D-765, along with a proposed inspection frequency, under separate cover. After the tanks have been approved as "RCRA Stable" by CDPHE, they will be labeled with their status and inspection frequency. In addition, the Master List of RCRA Hazardous Waste Units at Rocky Flats will be updated.

### **4.0 SUMMARY**

The requirements of the CDD for Phase I activities in the RCRA closure of System #12 in Building 771 have been fulfilled as stated in the document. In addition, all of the tanks in this system meet the requirements for the "RCRA Stable" condition.

99-RF-XXXXXX

Mr Steve Tarlton, RF Oversight Team Unit Leader  
Federal Facilities Program  
Colorado Department of Public Health and the Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

**SUMMARY REPORT OF PHASE I RCRA CLOSURE ACTIVITIES FOR TANK AND  
ANCILLARY EQUIPMENT SYSTEM #18 IN BUILDING 771 – KN-XXX-99**

Dear Mr. Tarlton

Pursuant to the *RCRA Closure Plan for Interim Status Units* (July, 1998) (Closure Plan) and the *Closure Description Document for Tank and Ancillary Equipment System #18 in Building 771* (RF/RMRS-99-396 UN), Kaiser-Hill Company, L L C is submitting the enclosed Summary Report of Phase I RCRA Closure Activities for Tank and Ancillary Equipment System #18 in Building 771.

The summary report contains a description of major closure activities and a declaration that the tanks in these systems meet the requirements for the "RCRA Stable" condition

If you have any questions, please contact Tom Baker of Rocky Mountain Remediation Services at 303-966-4329

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Karan North, Division Manager      Date  
Environmental Systems & Stewardship  
Kaiser-Hill Company, L L C.

cc  
C Gilbreath                      -      CDPHE  
D Grosek                         -      DOE, RFFO  
J E Springer                    -      DOE, RFFO  
T C Baker                        -      RMRS  
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